

Montgomery County Local Rules

IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA

IN RE:

04 - 00001

REVISION OF THE ~~MONTGOMERY COUNTY~~ LOCAL RULES OF CIVIL PROCEDURE GOVERNING MOTION PRACTICE

ORDER

AND NOW, this 14 day of April, 2004, the Court approves and adopts the attached Revision of the Montgomery County Local Rules of Civil Procedure Governing Motion Practice. This Revision shall become effective on July 26, 2004.

The Court Administrator is directed to publish this Order once in the Montgomery County Law Reporter and in the Legal Intelligencer. In conformity with Pa.R.C.P. 239, seven (7) certified copies of the within Order shall be filed by the Court Administrator with the Administrative Office of Pennsylvania Courts. This Revision shall also be published on the web site of the Administrative Office of Pennsylvania Courts (www.aopc.org). Two (2) certified copies shall be distributed to the Legislative Reference Bureau for publication in the *Pennsylvania Bulletin*. One (1) certified copy shall be filed with the Civil Procedural Rules Committee. One (1) copy shall be filed with the Prothonotary, one (1) copy with the Clerk of Courts, and (1) copy with the Court Administrator of Montgomery County, one (1) copy with the Law Library of Montgomery County and one (1) copy with each Judge of this Court.



2004-00001-0002
Orders Montco (Subsequent)
Montgomery County Prothonotary
William E Donnelly

Wednesday, April 14, 2004 02:26:00 PM

FROM THE RECORDS OF THE
MONTGOMERY COUNTY PROTHONOTARY,
COURT OF COMMON PLEAS,
MONTGOMERY COUNTY, PA.

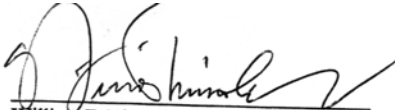
WILLIAM E. DONNELLY, PROTHONOTARY

for [Signature] CLERK

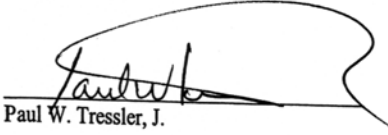
BY THE COURT:

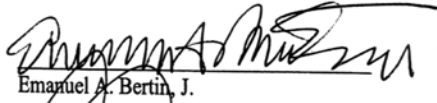
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S. GERALD CORSO, P.J.

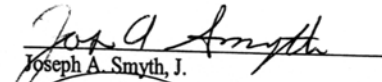
Montgomery County Local Rules


William T. Nicholas, J.

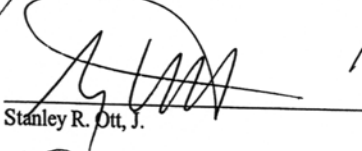

Kent H. Albright, J.

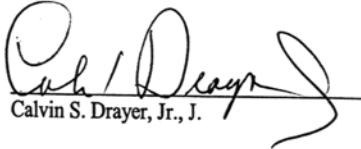

Paul W. Tressler, J.

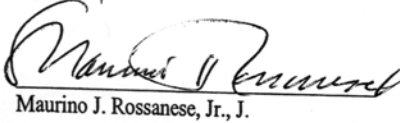

Emanuel A. Bertin, J.

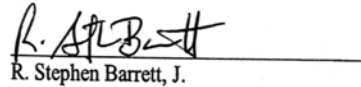

Joseph A. Smyth, J.

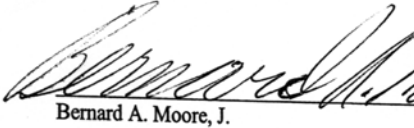

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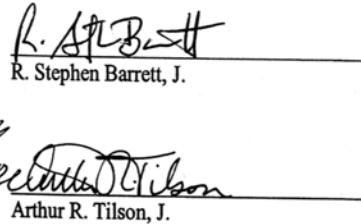

Stanley R. Ott, J.

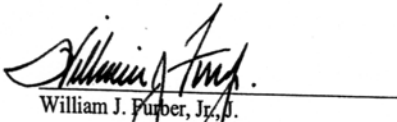

Calvin S. Drayer, Jr., J.

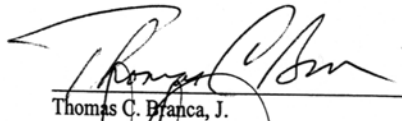

Maurino J. Rossanese, Jr., J.


R. Stephen Barrett, J.

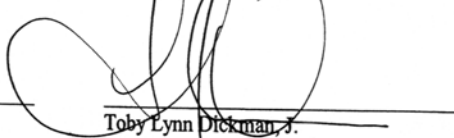

Bernard A. Moore, J.

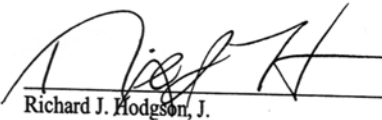

Arthur R. Tilson, J.

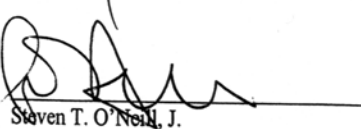

William J. Furber, Jr., J.

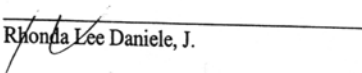

Thomas C. Branca, J.

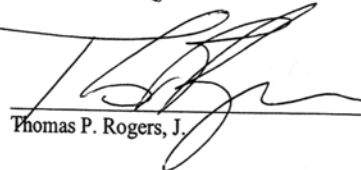

William R. Carpenter, J.


Toby Lynn Dickman, J.


Richard J. Hodgson, J.


Steven T. O'Neil, J.


Rhonda Lee Daniele, J.


Thomas P. Rogers, J.

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Rule 205.2(b). Cover Sheet**4/12**

The cover sheet required by Rules 208.3(b), 1028(c), 1034(a) and 1035.2(a) shall be as follows:

- (1) Cover Sheet of the Moving Party

See Form

- (2) Cover Sheet of the Respondent

See Form

Rule 206.1(a). Petition. Definition.

The following applications are defined as “petitions”, and are to be governed by Rule 206.1, et seq.:

- (1) Requests to transfer venue on the ground of *forum non conveniens*.

Comment:

1. The following applications are not governed by Rule 206.1, et seq. or by Rule 208.1, et seq., but rather are governed by the provisions of the general rule(s) governing the particular matter: Request to Appoint Trustee or Receiver pursuant to Pa.R.C.P. 1533; Petition to Compromise, Settle or Discontinue Minor’s Action pursuant to Pa.R.C.P. 2039 and Local Rule 2039(a)*; Petition for Supplementary Relief in Aid of Execution pursuant to Pa.R.C.P. 3118; Petition to Fix Fair Market Value of Real Property Sold pursuant to Pa.R.C.P. 3282; Petition for Appointment of Viewers pursuant to 26 P.S. § 1-504; Petition to Post Bond in Land Use Appeals pursuant to 53 P.S. §11003-A; Petition to Intervene pursuant to Pa.R.C.P. 2328; Petition for Change of Name pursuant to 54 Pa.C.S.A. § 701 et seq.

Rule 206.4(c). Issuance of a Rule to Show Cause.

(1) *Issuance.* The issuance of a Rule to Show Cause for petitions governed by Rule 206.1, et seq., shall issue as a matter of course pursuant to Rule 206.6. Petitions governed by this Rule shall not be faced with a cover sheet of moving party, but rather shall be accompanied by a proposed order in the following form:

See Form *Proposed Order*

The petition and proposed order shall be filed in the Prothonotary’s Office, and forwarded to the Court Administrator, who shall have the authority to sign the Rule to Show Cause Order.

If a petitioner requests a stay of execution pending disposition of a petition to open default judgment, or any other petition governed by this rule, the Court Administrator shall promptly refer the stay request to the Civil Equity/Emergency Judge for review and determination.

(2) *Praecepte.* After the filing of respondent’s answer and/or the completion of discovery, any party may file with the Prothonotary, in duplicate, a praecipe for argument in the form set forth herein, including a certification that a copy thereof has been served upon all other parties. If the respondent does not file an answer to the petition within the timeframe outlined in the proposed order, petitioner may, by checking the appropriate box on the argument praecipe, request the court to consider the petition without the need for briefs, and enter an appropriate order in accordance with Rule 206.7(a).

The Prothonotary shall forthwith deliver a copy of the praecipe to Court Administration. The praecipe shall be in the following form:

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See Form *Argument Praecipe*

(3) *Briefs.* The brief of the moving party shall be filed in the Prothonotary's Office within thirty (30) days of the filing of the praecipe for argument, unless otherwise directly by the assigned Judge. The brief of the respondent shall be filed within thirty (30) days of the date of the filing of the moving party's brief.

If the brief of either party is not timely filed, either in accordance with this Rule or by order of the Court, the assigned Judge may:

- (a) Dismiss the petition where the moving party has failed to comply;
- (b) Grant the requested relief where the respondent has failed to comply, except that no civil action or proceeding shall be dismissed for failure to comply;
- (c) List the matter for argument, at which time only the complying party shall be heard; or
- (d) Impose such other sanctions upon the non-complying party as the Judge shall deem proper.

(4) *Disposition.* Once briefs are filed, the matter shall be referred to the assigned Judge for disposition. If oral argument is requested by either party on either their respective cover sheets or the argument praecipe, the matter shall then be scheduled for argument. If oral argument is not requested by either party, the assigned Judge may direct the scheduling of argument, or may simply decide the matter upon the filings.

Rule 208.2(c). Motion. Brief Statement of Applicable Authority

Any motion filed pursuant to Rule 208.1 shall include a brief statement of the applicable authority.

Rule 208.2(d). Uncontested Motions. Certification.

If counsel for the moving party determines that a motion is uncontested by all parties involved in the case, counsel may file a certification that the motion is uncontested. This certification language is included on the cover sheet of the moving party required by Local Rule 208.3(b). By checking the appropriate box on the cover sheet of the moving party, and signing the certification section of the cover sheet, counsel for the moving party will satisfy the certification requirement under this Rule.

Disposition of an uncontested motion is governed by Local Rule 208.3(a).

Rule 208.2(e). Motions Relating to Discovery. Certification.

Any motion relating to discovery must include a certification by counsel for the moving party that counsel has conferred or attempted to confer with all interested parties in order to resolve the matter without court action. This certification language is included on the cover sheet of moving party required by Local Rule 208.3(b). By checking the appropriate box on the cover sheet of the moving party, and signing the certification section of the cover sheet, counsel for the moving party will satisfy the certification requirement under this Rule.

Rule 208.3(a). Motions. Simplified Procedure.

The following "motions" shall be considered by the court without written responses or briefs:

- (1) Requests for Alternative Service pursuant to Rule 430;
- (2) Requests to Proceed Informa Pauperis (Rule 240);
- (3) Any motion certified as uncontested pursuant to Local Rule 208.2(d).

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The foregoing motions, after filing with the Prothonotary, shall be presented to the Court Administrator. The Court Administrator shall promptly deliver the motion to the Civil Equity/ Emergency Judge for review and determination.

Rule 208.3(b). Motion Practice. Rule to Show Cause.

(1) *Filing.* All other “motions” as defined by Rule 208.1, excepting those listed above in Local Rule 208.3(a), shall be governed by this Rule. All such motions shall be faced with a cover sheet of the moving party in the form set forth in Local Rule 205.2(b) and shall be accompanied by the moving party’s proposed order. The motion, together with the cover sheet, shall be presented to the Court Administrator, after filing with the Prothonotary, for a return day on the rule.

(2) *Listing.* Excepting motions for sanctions or contempt of a prior court order, the Court Administrator shall fix promptly a return day which **shall not be less than thirty (30) days** from the date of filing of said motion, and the moving party shall forthwith serve the respondent with a copy of the motion and the cover sheet indicating the return day thereon. The moving party shall thereafter file a certification that the motion and the rule return date were served upon all parties, in substantially the following form:

See Form *Certificate of Service*

Motions for sanctions or contempt of a prior court order shall be forwarded by the Court Administrator to the assigned Judge for the scheduling of a hearing.

Motions that are alleged to be “emergencies” will not initially be given a rule return date, but rather the Court Administrator will forward the emergency motion to the assigned Judge. If the matter is deemed to be an emergency by the assigned Judge, the Judge will process the matter accordingly. If the matter is not deemed to be an emergency, the matter will be returned to the Court Administrator for listing pursuant to this Rule.

(3) *Response.* At or before the call of the list on the return day, the respondent shall file an answer to the motion, even if there are no contested issues of fact. The answer shall be faced with the respondent’s cover sheet in the form set forth in Rule 205.2(b) and shall be accompanied by a proposed order.

Comments:

1. Rule 208. 1(b) (1) (iv) specifically excludes motions to exclude expert testimony pursuant to Rule 207.1 and motions in limine from the above process. These motions are filed with the Prothonotary and referred to the trial judge, upon assignment of trial.
2. Rule 208.1(b)(2)(i) specifically excludes asbestos litigation matters from the above process. Motions filed in said matters are handled pursuant to Local Rule 1041.1*.
3. Requests for leave to withdraw an appearance in family court actions pursuant to Rule 1012 and requests under local Rule 229(a)*(1) are considered “motions” that are subject to this Rule.

Rule 208.4. Disposition of Motions.

(1) *Initial Consideration of Motion - Rule Return Day.* On the return day, the Court Administrator or his/her designee shall call all matters listed. If a response is not filed to the motion at or before the call of the list, the court will treat the motion as uncontested, and grant the requested relief, if appropriate, and if a proper certificate of service was filed pursuant to Local Rule 208.3(b)(2), In the absence of a proper certificate of service, the motion will be stricken.

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Matters relating to discovery in which responses have been filed will proceed by Local Rule 4019*. Motions raising appealable matters in which responses have been filed will proceed pursuant to section (2) herein. All other matters (interlocutory) in which responses have been filed will forthwith be referred to the assigned Judge for disposition, including argument, if requested.

(2) *Praeipce.* On all motions raising appealable matters in which responses have been filed, the Court Administrator, after the return day, will issue an order directing the completion of discovery, if necessary, within sixty (60) days of the date of the order. Upon completion of discovery, if necessary, any party may file with the Prothonotary, in duplicate, a praecipe for argument in the form set forth herein, including a certification that a copy thereof has been served upon all other parties. The Prothonotary shall forthwith deliver a copy of the praecipe to Court Administration. The praecipe shall be in the following form:

See Form *Argument Praeipce*

(3) *Briefs.* For motions raising appealable matters, the brief of the moving party shall be filed in the Prothonotary's Office within thirty (30) days of the filing of the praecipe for argument, unless otherwise directly by the assigned Judge. Regarding appealable matters, the brief of the respondent shall be filed within thirty (30) days of the date of the filing of the moving party's brief.

For motions raising interlocutory matters, where the Court orders briefs, the brief of the moving party shall be filed in the Prothonotary's Office within thirty (30) days of the date of said order and the respondent's brief shall be filed within thirty (30) days of the filing of the brief of the moving party, unless otherwise directly by the assigned Judge. A party may also voluntarily file a brief regarding interlocutory matters even though not specifically directed by the Court.

If the brief of either party is not timely filed, either per the directive of this Rule or by order of the Court, the assigned Judge may:

- (a) Dismiss the motion where the moving party has failed to comply;
- (b) Grant the requested relief where the respondent has failed to comply, except that no civil action or proceeding shall be dismissed for failure to comply;
- (c) List the matter for argument, at which time only the complying party shall be heard; or
- (d) Impose such other sanctions upon the non-complying party as the Judge shall deem proper.

(4) *Disposition.* Once briefs, if required, are filed, the matter shall be referred to the assigned Judge for disposition. If oral argument was requested by either party on either their respective cover sheets or the argument praecipe, the matter shall be scheduled for argument. If oral argument was not requested by either party, the assigned Judge may direct the scheduling of argument, or may simply decide the matter upon the filings.

Comments:

1. Appealable matters are those that are before the Court for final judgment or adjudication. Please refer to the Pennsylvania Rules of Appellate Procedure for further guidance.
2. Motions relating to discovery in family law actions - excluded from the above process by Rule 208.1(b)(2)(iv) - are governed by Local Rule 4019.1* Family Discovery Master.

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Rule *301. Argument Court - Interlocutory Matters.

Rescinded.

Rule *302. Argument Court — Appealable Matters.

Rescinded.

Rule *303. Argument Court Forms.

Rescinded.

Rule *406. Termination of Inactive Cases.

Rescinded.

Rule 1028(c). Preliminary Objections.

(1) *Filing.* Preliminary objections shall be faced with a cover sheet of the moving party in the form set forth in Local Rule 205.2(b) and shall be accompanied by the moving party's proposed order. The moving party shall check the box on the cover sheet requiring a response, if any, per the Pennsylvania Rules of Civil Procedure. Preliminary objections are not given a rule return date by Court Administration.

(2) *Response.* The respondent shall file an answer or other responsive document in accordance with the Pennsylvania Rules of Civil Procedure, if any, which response shall be faced with a cover sheet of the respondent in the form set forth in Local Rule 205.2(b) and shall be accompanied by the respondent's proposed order. After the response is filed, if any, where any party demands discovery, the parties shall complete such discovery within sixty (60) days of the filing of the response, unless otherwise directed by the Court.

(3) *Praecepte.* After the filing of respondent's answer and/or the completion of discovery, any party may file with the Prothonotary, in duplicate, a praecipe for argument in the form set forth herein, including a certification that a copy thereof has been served upon all other parties. The Prothonotary shall forthwith deliver a copy of said praecipe to Court Administration. The praecipe shall be in the following form:

See Form *Argument Praecepte*

(4) *Briefs.* For preliminary objections raising appealable matters, the brief of the moving party shall be filed in the Prothonotary's Office within thirty (30) days of the filing of the praecipe for argument, unless otherwise directly by the assigned Judge. Regarding appealable matters, the brief of the respondent shall be filed within thirty (30) days of the date of the filing of the moving party's brief.

For preliminary objections raising interlocutory matters, where the Court orders briefs, the brief of the moving party shall be filed in the Prothonotary's Office within thirty (30) days of the date of said order and the respondent's brief shall be filed within thirty (30) days of the filing of the brief of the moving party, unless otherwise directly by the assigned Judge. A party may also voluntarily file a brief regarding interlocutory matters even though not specifically directed by the Court.

If the brief of either party is not timely filed, either in accordance with this Rule or by order of the Court, the assigned Judge may:

- (a) Dismiss the preliminary objections where the moving party has failed to comply;
- (b) Grant the requested relief where the respondent has failed to comply, except that no civil action or proceeding shall be dismissed for failure to comply;
- (c) List the matter for argument, at which time only the complying party shall be heard; or
- (d) Impose such other sanctions upon the non-complying party as the Judge shall deem proper.

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(5) *Disposition.* Once briefs, if required, are filed, the matter shall be referred to the assigned Judge for disposition. If oral argument was requested by either party on either their respective cover sheets or the argument praecipe, the matter shall be scheduled for argument. If oral argument was not requested by either party, the assigned Judge may direct the scheduling of argument, or may simply decide the matter upon the filings.

Comments:

1. Appealable matters are those that are before the Court for final judgment or adjudication. Please refer to the Pennsylvania Rules of Appellate Procedure for further guidance.
2. The term “party” or “parties” shall be deemed to mean counsel for a party or parties to a legal proceeding and such party or parties as are unrepresented by counsel.

Rule 1034(a). Motion for Judgment on the Pleadings.

(1) *Filing.* A motion for judgment on the pleadings shall be faced with a cover sheet of the moving party in the form set forth in Local Rule 205.2(b), and shall be accompanied by the moving party’s proposed order. The moving party shall check the box on the cover sheet requiring a response, if any, per the Pennsylvania Rules of Civil Procedure. Motions for judgment on the pleadings are not given a rule return date by Court Administration.

(2) *Response.* The respondent shall file an answer or other responsive document in accordance with the Pennsylvania Rules of Civil Procedure, if any, which shall be faced with a cover sheet of the respondent in the form set forth in Local Rule 205.2(b), and shall be accompanied by the respondent’s proposed order.

(3) *Praecipe.* After filing of respondent’s answer, if any, any party may file with the Prothonotary, in duplicate, a praecipe for argument in the form set forth herein, including a certification that a copy thereof has been served upon all other parties. The Prothonotary shall forthwith deliver a copy of said praecipe to Court Administration. The praecipe shall be in the following form:

See Form *Argument Praecipe*

(4) *Briefs.* For motions for judgment on the pleadings raising appealable matters, the brief of the moving party shall be filed in the Prothonotary’s Office within thirty (30) days of the filing of the praecipe for argument, unless otherwise directly by the Judge assigned to the case. Regarding appealable matters, the brief of the respondent shall be filed within thirty (30) days of the date of the filing of the moving party’s brief.

For motions for judgment on the pleadings raising interlocutory matters, where the Court orders briefs, the brief of the moving party shall be filed in the Prothonotary’s Office within thirty (30) days of the date of said order and the respondent’s brief shall be filed within thirty (30) days of the filing of the brief of the moving party, unless otherwise directly by the assigned Judge. A party may also voluntarily file a brief regarding interlocutory matters, even though not specifically directed by the Court.

If the brief of either party is not timely filed, either in accordance with this Rule or by order of the Court, the assigned Judge may:

- (a) Dismiss the motion where the moving party has failed to comply;
- (b) Grant the requested relief where the respondent has failed to comply, except that no civil action or proceeding shall be dismissed for failure to comply;

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- (c) List the matter for argument, at which time only the complying party shall be heard; or
- (d) Impose such other sanctions upon the non-complying party as the Judge shall deem proper.

(5) *Disposition.* Once briefs, if required, are filed, the matter shall be referred to the assigned Judge for disposition. If oral argument is requested by either party on their respective cover sheets or argument praecipe, the matter shall be scheduled for argument. If oral argument is not requested by either party, the assigned Judge may direct the scheduling of argument, or may simply decide the matter upon the filings.

Comments:

1. Appealable matters are those that are before the Court for final judgment or adjudication. Please refer to the Pennsylvania Rules of Appellate Procedure for further guidance.
2. The term "party" or "parties" shall be deemed to mean counsel for a party or parties to a legal proceeding and such party or parties as are unrepresented by counsel.

Rule 1035.2(a). Motion for Summary Judgment.

(1) *Filing.* A motion for summary judgment shall be faced with a cover sheet of the moving party in the form set forth in Local Rule 205.2(b) and shall be accompanied by the moving party's proposed order. The moving party shall check the box on the cover sheet requiring a response, if any, per the Pennsylvania Rules of Civil Procedure. Motions for summary judgment are not given a rule return date by Court Administration.

(2) *Response.* The respondent shall file an answer or other responsive document in accordance with the Pennsylvania Rules of Civil Procedure, if any, which shall be faced with a cover sheet of the respondent in the form set forth in Local Rule 205.2(b) and shall be accompanied by the respondent's proposed order. After the response is filed, if any, where any party demands discovery, the parties shall complete such discovery within sixty (60) days, unless otherwise directed by the Court.

(3) *Praecipe.* After filing of respondent's answer and/or the completion of discovery, any party may file with the Prothonotary, in duplicate, a praecipe for argument in the form set forth herein, including a certification that a copy thereof has been served upon all other parties. The Prothonotary shall forthwith deliver a copy of said praecipe to Court Administration. The praecipe shall be in the following form:

See Form *Argument Praecipe*

(4) *Briefs.* For motions for summary judgment raising appealable matters, the brief of the moving party shall be filed in the Prothonotary's Office within thirty (30) days of the filing of the praecipe for argument, unless otherwise directed by the Judge assigned to the case. Regarding appealable matters, the brief of the respondent shall be filed within thirty (30) days of the date of the filing of the moving party's brief.

For motions for summary judgment raising interlocutory matters, where the Court orders briefs, the brief of the moving party shall be filed in the Prothonotary's Office within thirty (30) days of the date of said order and the respondent's brief shall be filed within thirty (30) days of the filing of the brief of the moving party, unless otherwise directed by the assigned Judge. A party may also voluntarily file a brief regarding interlocutory matters even though not specifically directed by the Court.

If the brief of either party is not timely filed, either in accordance with this Rule or by order of the Court, the assigned Judge may:

Montgomery County Local Rules

- (a) Dismiss the motion where the moving party has failed to comply;
- (b) Grant the requested relief where the respondent has failed to comply, except that no civil action or proceeding shall be dismissed for failure to comply;
- (c) List the matter for argument, at which time only the complying party shall be heard; or
- (d) Impose such other sanctions upon the non-complying party as the Judge shall deem proper.

(5) *Disposition.* Once briefs, if required, are filed, the matter shall be referred to the assigned Judge for disposition, unless the underlying case has already been praeciped for trial or ordered on the trial list, in which case the motion will be assigned to the trial judge for disposition.

If oral argument was requested by either party on either their respective cover sheets or the argument praecipe, the matter shall be scheduled for argument. If oral argument was not requested by either party, the assigned Judge may direct the scheduling of argument, or may simply decide the matter upon the filings.

Comments:

1. Appealable matters are those that are before the Court for final judgment or adjudication. Please refer to the Pennsylvania Rules of Appellate Procedure for further guidance.
2. The term "party" or "parties" shall be deemed to mean counsel for a party or parties to a legal proceeding and such party or parties as are unrepresented by counsel.

Rule 4019*. Discovery Master.

In order to facilitate the prompt disposition of discovery motions, the Court adopts Local Rule of Civil Procedure 4019* implementing the "Discovery Master Program" as follows:

- (1) The Board of Judges shall appoint a designated number of members of the Bar who shall have practiced civil law in Montgomery County for a minimum of 15 years to serve as Discovery Masters, for an indeterminate term, without compensation, at the pleasure of the Court.
- (2) All motions relating to discovery, originally processed under Local Rule 208.3(b), other than a motion for sanctions, shall be subject to this Rule.
- (3) If the motion is resolved amicably prior to the return day issued pursuant to Local Rule 208.3(b), the motion shall either be withdrawn or a stipulated order shall be submitted to the Court Administrator for submission to the signing Judge. If the motion is opposed, the parties shall appear in a courtroom or arbitration room designated by the Court Administrator on the Friday of the week in which the rule was made returnable, to argue the matter before the Discovery Master designated by the Court Administrator to hear the matter. In the event that Friday is a legal holiday, the matter shall be argued before the Discovery Master on the Thursday following the return day. Briefs in support of and in opposition to the motion may be submitted to the Court Administrator's Office prior to the day on which the matter is to be argued before the Discovery Master.
- (4) After hearing argument and considering the motion, answer, and any briefs filed, the Discovery Master shall submit a written recommendation and proposed order to the assigned Judge for entry of an appropriate order.

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- (5) In civil actions in which the damages sought exceed the jurisdictional limit for compulsory arbitration, any party may request the judge assigned to the case to direct the Court Administrator to list the case for a Discovery Management Conference before a Discovery Master. The Discovery Master may recommend a Discovery Management Order, which establishes the following:
- a. A date for completion of all discovery, except for depositions for use at trial;
 - b. A date for plaintiff to submit expert reports and curricula vitae of said experts, or answer expert interrogatories;
 - c. A date for defendant to submit expert reports and curricula vitae of said experts, or answer expert interrogatories;
- (6) The parties may, by agreement in writing, extend any dates set forth in the Discovery Management Order.
- (7) Upon request of any party, for good cause shown, the Discovery Master may recommend an extension of any dates set forth in the Discovery Management Order.

Montgomery County Local Rules

IN THE COURT OF COMMON PLEAS OF
MONTGOMERY COUNTY, PENNSYLVANIA
CIVIL DIVISION

:

VS.

:
:
:
:
:
:

NO.

COVER SHEET OF RESPONDENT

Date of Filing _____ Respondent _____

Counsel for Respondent _____ I.D. No. _____

Document Filed (Specify) _____

RULE RETURN DATE of Related Motion _____

Matter is (Check One) _____ (Appealable) _____ (Interlocutory)

Oral Argument _____ (Yes) _____ (No)

Respondent Requires (Specify Reason Only if Interlocutory) :

_____ DISCOVERY _____

Montgomery County Local Rules

IN THE COURT OF COMMON PLEAS OF
MONTGOMERY COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

:

VS.

:
:
:
:
:
:

NO.

ARGUMENT PRAECIPE

Please submit the following matter to the designated Judge for disposition:

INTERLOCUTORY matter:

(Specify) _____

(Name of Moving Party) _____

APPEALABLE matter:

(Specify) _____

(Name of Moving Party) _____

ORAL ARGUMENT: Requested Waived

NO ANSWER FILED - (*for petitions governed by Rule 206.1 ONLY*) - Petitioner certifies that the time period for response to the above petition, as directed in the proposed order attached to the petition, has expired, and that no answer was filed to the subject petition. Accordingly, petitioner requests the court to consider the petition without the need for briefs, and enter an appropriate order in accordance with Rule 206.7(a).

Signature of Filing Party

Name Typed and Attorney I.D. #

Phone Number

NOTE - PRAECIPES TO BE FILED IN DUPLICATE WITH THE PROTHONOTARY BRIEFS OR MEMORANDUMS TO BE FILED WITH THE PROTHONOTARY

